EXHIBIT H

Declaration of Director Charles Daniels

EXHIBIT H

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Specially Appearing as

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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MARCELL WILLIAMS,

Plaintiff.

vs.

WARDEN OF SOUTHERN DESERT CORRECTIONAL CENTER, et al.,

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_____ Defendants.

CASE NO. 2:20-cv-00639-RFB-BNW

DECLARATION OF DIRECTOR CHARLES DANIELS

- I, Charles Daniels, hereby declare based on personal knowledge and/or information and belief, that the following assertions are true.
- 1. I am currently employed as the Director of the Nevada Department of Corrections (NDOC). As Director, I am responsible for all aspects of NDOC. In order to fulfill these duties, I have appointed several Deputy Directors and a Medical Director. Each of these individuals oversee certain aspects of NDOC administration.
- 2. Dr. Michael Minev currently serves as NDOC's Medical Director. I work closely with him to ensure the health and safety of our inmates, the most paramount responsibility bestowed upon me as NDOC Director, is at all times given the utmost priority.
- 3. The advent of the novel coronavirus and the COVID-19 pandemic gripping our world as required me, Dr. Minev, and all of NDOC's staff to take extraordinary measures to prevent and limit the spread of COVID-19 within the walls of NDOC's institutions.

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- 4. In this regard, I have authorized Dr. Minev to take all preventive precautions that he believes are medically prudent. These steps have included the implementation of screening of all NDOC employees and vendors prior to entering any NDOC facility. Refusal to assist in this process excludes that individual's entrance to the facility, and should the individual be an employee, additional administrative measures may result.
- Based on Dr. Miney's medical advice, I have required all NDOC institutions 5. to abide by the protocols Dr. Minev believes allows NDOC to attack this pandemic in the best possible way.
- 6. To reiterate the importance of these protocols, most of not all of which were implemented on or about March 3, 2020, I authored and directed dissemination of the March 16, 2020 memorandum, bates-labeled NDOC-COVID000018, which I understand from Chief Deputy Attorney General has been provided to the Court as **Exhibit A** in the filing that this declaration will also be made a part of. I have had an opportunity to review the March 16 memorandum and attest that it is a true and accurate copy of the memorandum authored and disseminated on March 16, 2020.
- 7. I declare under penalty of perjury pursuant to 28 U.S.C. section 1746 that the foregoing is true and correct.

/s/ Charles Daniels* CHARLES DANIELS

Director, Nevada Department of Corrections

EXECUTED this 8th day of April, 2020

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* Pursuant to Temporary General Order 2020-05, entered by Chief Judge Du on March 30, https://www.nvd.uscourts.gov/wp-content/uploads/2020/03/GO-2020-05-re-COVID-19-Remote-Hearings.pdf, Director Daniels has provided authorization to counsel to affix his electronic signature to this Declaration.